

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Steven Dougherty
Tracey Dougherty

CHAPTER 13

U.S. Bank National Association, as Indenture
Trustee, successor in interest to Bank of America,
National Association, as Indenture Trustee,
successor by merger to LaSalle Bank National
Association, as Indenture Trustee for AFC Trust
Series 2000-4

NO. 11-19313 MDC

Movant

11 U.S.C. Section 362

vs.

Steven Dougherty
Tracey Dougherty

Debtors

William C. Miller Esq.

Trustee

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. The post-petition arrearage on the mortgage held by Movant on Debtors' residence
is **\$2,877.46**, which breaks down as follows;

Post-Petition Payments:	May 2016 through August 2016 at \$778.58
Suspense:	(\$236.86)
Total Post-Petition Arrears	\$2,877.46

2. Debtors shall cure said arrearages in the following manner;

a). Beginning September 2016 and continuing through December 2016, until the
arrearages are cured, Debtors shall pay the present regular monthly payment of **\$778.58** on the
mortgage (or as adjusted pursuant to the terms of the mortgage) on or before the first (1st) day of each
month (with late charges being assessed after the 15th of the month), plus an installment payment of
\$719.37 towards the arrearages on or before the last day of each month at the address below;

JPMorgan Chase Bank, N.A.
3415 Vision Drive
Mail Code OH4-7142
Columbus, OH 43219

b). Maintenance of current monthly mortgage payments to Movant thereafter.

3. Should Debtors provide sufficient proof of payments (front & back copies of cancelled checks and/or money orders) made, but not credited, Movant shall adjust the account accordingly.

4. In the event the payments under Section 2 above are not tendered pursuant to the terms of this stipulation, Movant shall notify Debtors and Debtors' attorney of the default in writing and Debtors may cure said default within FIFTEEN (15) days of the date of said notice. If Debtors should fail to cure the default within fifteen (15) days, Movant may file a Certification of Default with the Court and the Court shall enter an Order granting Movant relief from the automatic stay.

5. The stay provided by Bankruptcy Rule 4001(a)(3) is waived.

6. If the case is converted to Chapter 7, Movant shall file a Certification of Default with the court and the court shall enter an order granting Movant relief from the automatic stay.

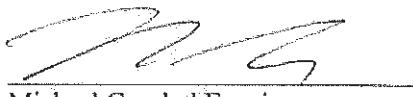
7. If the instant bankruptcy is terminated by either dismissal or discharge, this agreement shall be null and void, and is not binding upon the parties.

8. The provisions of this stipulation do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this stipulation, including fees and costs, due under the terms of the mortgage and applicable law.

9. The parties agree that a facsimile signature shall be considered an original signature.

Date: September 23, 2016

By: /s/ Joshua I. Goldman, Esquire
Joshua I. Goldman, Esquire
Attorneys for Movant
KML Law Group, P.C.
Main Number: (215) 627-1322


Michael Gumbel Esquire
Attorney for Debtors

10/4/16
No Objection:
Jacqueline A. Charles
TRUSTEE
7/20/16
***without prejudice to any
trustee rights or remedies**

Approved by the Court this 18th day of October, 2016. However, the court retains discretion regarding entry of any further order.

Magdalene D. Coleman
Bankruptcy Judge, Magdalene D. Coleman